

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA
ABINGDON DIVISION

UNITED STATES OF AMERICA

v.

Case No. 1:19-CR-00022 (JPJ)

WAQAR UL-HASSAN

MEMORANDUM OF AGREEMENT

The United States, by and through the United States Attorney for the Western District of Virginia, the defendant, and his counsel, Randy Cargill, Assistant Federal Public Defender, (hereinafter, "the parties") hereby enter into this Memorandum of Agreement revising the Plea Agreement (Dkt. No. 30) in this matter.

On August 7, 2019, pursuant to the written Plea Agreement signed by all the parties, the defendant pled guilty to a superseding information charging two counts of making materially false statements in violation of 18 U.S.C. § 1001.

The Plea Agreement stipulated, pursuant to Rule 11(c)(1)(C), that the defendant shall be sentenced to "*a period of incarceration of time served and to a term of probation of ten years (i.e. a term of five years' probation on both Counts 1 and 2, to run consecutively).*" (Dkt. No. 30 at 2)(emphasis added).

By this memorandum of agreement, the parties seek to revise this aforementioned provision of the Plea Agreement to "*a term of probation of five years (i.e., a term of five years' probation on both Counts 1 and 2, to run concurrently).*" The parties make this revision because the parties intend the defendant to be sentenced to a five-year term of probation, and the parties agree this is a reasonable sentence considering all of the facts and circumstances of this case.

Defendant's Initials: W-H

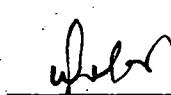
Finally, the parties understand and acknowledge that this Memorandum of Agreement, like the Plea Agreement, is subject to the acceptance of the Court. All remaining provisions of the Plea Agreement shall remain unchanged.

Date: 10/23/19



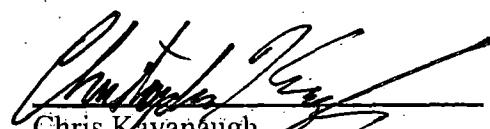
Randy Cargill, Esq.
Counsel for Defendant

Date: 10/23/19



Waqar Ul Hassan
Defendant

Date: 10/23/19



Chris Kavanaugh
Assistant United States Attorney

Defendant's Initials: W-H